

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ABIGAIL LOPEZ RODRIGUEZ

DEBTOR

CASE NO. 14-09749-BKT

CHAPTER 13

**DEBTOR'S MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COMES, ABIGAIL LOPEZ RODRIGUEZ, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated June 22, 2015, herewith and attached to this motion.
2. This Plan modification is filed to correct the amount of post-petition arrears owed to creditor Banco Popular de Puerto Rico.

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I **CERTIFY**, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent

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Post confirmation modification of chapter 13 Plan
Case no. 14-09749-BKT13

via regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 22nd day of June, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 3:14-bk-9749

LOPEZ RODRIGUEZ, ABIGAIL

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: <u>6/22/2015</u> <input type="checkbox"/> AMENDED PLAN DATED: _____ <input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other													
<p>I. PAYMENT PLAN SCHEDULE</p> <table style="width:100%;"> <tr> <td>\$ <u>150.00</u> x <u>6</u> = \$</td> <td><u>900.00</u></td> </tr> <tr> <td>\$ <u>215.00</u> x <u>44</u> = \$</td> <td><u>9,460.00</u></td> </tr> <tr> <td>\$ <u>225.00</u> x <u>10</u> = \$</td> <td><u>2,250.00</u></td> </tr> <tr> <td>\$ _____ x _____ = \$</td> <td></td> </tr> <tr> <td>\$ _____ x _____ = \$</td> <td></td> </tr> <tr> <td colspan="2" style="text-align: right;">TOTAL: \$ <u>12,610.00</u></td> </tr> </table> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows: _____ _____</p> <p><input type="checkbox"/> Other: _____ _____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>12,610.00</u></p>	\$ <u>150.00</u> x <u>6</u> = \$	<u>900.00</u>	\$ <u>215.00</u> x <u>44</u> = \$	<u>9,460.00</u>	\$ <u>225.00</u> x <u>10</u> = \$	<u>2,250.00</u>	\$ _____ x _____ = \$		\$ _____ x _____ = \$		TOTAL: \$ <u>12,610.00</u>		<p>II. DISBURSEMENT SCHEDULE</p> <p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</p> <p>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <u>Banco Popular De P</u> Cr. <u>Banco Popular De P</u> Cr. _____ # <u>Claim #1-1</u> # <u>Post-Petition arrears</u> # _____ \$ <u>3,239.18</u> \$ <u>1,458.96</u> \$ _____ 2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. <u>Auto Cash Inc</u> Cr. _____ Cr. _____ # <u>2054</u> # _____ # _____ \$ <u>1,300.00</u> \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: _____ 5. <input type="checkbox"/> Other: _____ 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <u>Banco Popular De P</u> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) * Additional Attorney's Fees: \$150.00 payment for the services rendered in connection to debtor(s)' post confirmation plan and related procedures for approval, pursuant to R. 2016 (f)(3). * Debtor(s) to provide auto insurance (Eastern America Insurance Company) upon maturity to Auto Cash, Inc. through the Plan. </p>
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\$ <u>215.00</u> x <u>44</u> = \$	<u>9,460.00</u>												
\$ <u>225.00</u> x <u>10</u> = \$	<u>2,250.00</u>												
\$ _____ x _____ = \$													
\$ _____ x _____ = \$													
TOTAL: \$ <u>12,610.00</u>													
<p>III. ATTORNEY'S FEES (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,868.00</u></p>													
<p>Signed: <u>/s/ ABIGAIL LOPEZ RODRIGUEZ</u> Debtor</p> <p>_____ Joint Debtor</p>													

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Attorney for Debtor R. Figueroa Carrasquillo Law Office

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Label Matrix for local noticing
0104-3
Case 14-09749-BKT13
District of Puerto Rico
Old San Juan
Mon Jun 22 14:57:38 AST 2015

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SAN JUAN, PR 00917-2202

BPPR AS SERVICING AGENT FOR AUTORIDAD PARA E
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Oklahoma City, OK 73124-8848

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Humacao, PR 00791

Auto Cash, Inc.
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End of Label Matrix
Mailable recipients 17
Bypassed recipients 0
Total 17